

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 1189.10
REPORTING AND RECORDKEEPING REQUIREMENTS
FOR THE
PROPOSED RULE ON
CATHODE RAY TUBES**

November 2001

Table of Contents

1.	IDENTIFICATION OF THE INFORMATION COLLECTION	Page 2
1(a)	<u>Title and Number of Information Collection</u>	Page 2
1(b)	<u>Characterization of the Information Collection</u>	Page 2
2.	NEED FOR AND USE OF THE COLLECTION	Page 3
2(a)	<u>Need and Authority for the Collection</u>	Page 3
2(b)	<u>Use and Users of the Data</u>	Page 3
3.	RESPONDENTS AND THE INFORMATION REQUESTED	Page 3
3(a)	<u>Respondents and SIC Codes</u>	Page 3
3(b)	<u>Information Requested</u>	Page 6
4.	THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT	Page 7
4(a)	<u>Agency Activities</u>	Page 8
4(b)	<u>Small Entity Flexibility</u>	Page 8
5.	NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA	Page 8
5(a)	<u>Non-duplication</u>	Page 8
5(b)	<u>Consultations</u>	Page 8
5(c)	<u>Effects of Less Frequent Collection</u>	Page 8
5(d)	<u>General Guidelines</u>	Page 9
5(e)	<u>Confidentiality</u>	Page 9
5(f)	<u>Sensitive Questions</u>	Page 9
6.	ESTIMATING THE BURDEN AND COST OF COLLECTION	Page 9
6(a)	<u>Estimating Respondent Burden</u>	Page 9
6(b)	<u>Number of Respondents</u>	Page 9
6(c)	<u>Estimating Respondent Costs</u>	Page 13
6(d)	<u>Reasons for Change in Burden</u>	Page 13
6(e)	<u>Burden Statement</u>	Page 16

LIST OF TABLES

Table 1	Estimated Number of CRT Shipments	11
Table 2	Reporting and Recordkeeping Requirements for Used CRT Regulated Entities: Annual Estimated Respondent Burden and Cost	12
Table 3	Reporting and Recordkeeping Requirements for Used CRT Generators and Processors: Annual Respondent Burden and Cost Summary (All Respondents)	14
Table 4	Average and Total Annual Avoided Respondent Burden (Hours)	15
Table 5	Average Annual Burden per Respondent (Hours)	16

1. IDENTIFICATION OF THE INFORMATION COLLECTION

A. Background

1(a) Title and Number of Information Collection

This Information Collection Request (ICR) is entitled "Reporting and Recordkeeping Requirements for the Proposed Rule on Cathode Ray Tubes, Number 1189.10."

1(b) Characterization of the Information Collection

Section 3001 of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, requires the Environmental Protection Agency (EPA) to identify substances that must be managed as hazardous waste during treatment, storage, or disposal. Under this authority, EPA established four hazardous waste characteristics (toxicity, reactivity, ignitability, and corrosivity), and listed specific wastes that must be managed as hazardous. Used cathode ray tube (CRT) glass often is hazardous because it exhibits the characteristic of toxicity by exceeding the regulatory level for lead. As a result, currently many CRTs are subject to controls under RCRA Subtitle C hazardous waste regulations.

From 1994 through 1998, EPA's Common Sense Initiative (CSI) Council explored the environmental regulation of six industry sectors and looked for ways to make environmental regulation "cleaner, cheaper, and smarter." EPA established the CSI Council as an advisory committee under the Federal Advisory Committee Act. The CSI Council included representatives from each of the industry sectors, from non-government environmental and community organizations, from state government, and from academia. EPA also established a subcommittee of the Council for each of the industry sectors that included representatives of the various stakeholders represented in the CSI Council. One of the industry sectors selected for this initiative was the computer and electronics industry. The CSI Computers and Electronics Subcommittee (CES) set up a workgroup to address regulatory barriers to pollution prevention and recycling. The "Overcoming Barriers Workgroup," explored the problems of managing mounting volumes of outdated computer and electronics equipment.

One of the concerns investigated by the Overcoming Barriers Workgroup and the CES Subcommittee was the barrier to CRT glass recycling created by some existing hazardous waste management regulations. The Subcommittee stated that removing this barrier was essential to fostering CRT recycling, especially glass-to-glass recycling. As a result of the finding of the CES Subcommittee, the CSI Council issued a document titled *Recommendation on Cathode Ray Tube (CRT) Glass-to-Glass Recycling*.

To encourage CRT glass recycling and improve the management of hazardous waste CRTs, EPA is excluding used CRTs and processed CRT glass sent for recycling from the definition of solid waste, subject to certain minimal conditions. The Agency believes these materials resemble articles in commerce more than wastes when handled appropriately. By excluding used CRTs and processed CRT glass that are to be recycled from the definition of solid waste, the proposal streamlines management requirements for these materials. The streamlined requirements will lead to better management and more recycling while affording full protection to human health and the environment.

B. Introduction

Most of the proposal's information collection requirements consist of recordkeeping. EPA is not proposing any permitting requirements for entities recycling used CRTS or processed CRT glass. Following is a brief description of the proposal's information collection requirements. It should be noted that this ICR does not examine the burden or cost associated with the generation and management of hazardous waste CRTs or processed CRT glass that is destined for disposal. This category of CRTs continues to be considered hazardous waste and must be managed in accordance with the existing Subtitle C requirements.

Marking

Broken used CRTs destined for recycling must be clearly labeled or marked. Processed CRT glass need not be labeled and marked, unless it is going to a recycler other than a glass-to-glass manufacturer or a lead smelter. These requirements are necessary in order to identify and distinguish used CRTs and processed CRT glass from other materials and to prevent inadvertent mixing with other wastes.

Storage Time Limits

Broken used CRTs and processed CRT glass, in order to be excluded from the definition of solid waste, may not be speculatively accumulated.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

The requirements covered in this ICR are necessary for EPA to ensure proper management of used CRTs and processed CRT glass and to facilitate enforcement of the regulations.

2(b) Use and Users of the Data

EPA will use the collected information to ensure that used CRTs and processed CRT glass are being managed in a protective manner. Information marked on containers with broken used CRTs or processed CRT glass will assist handlers, processors, and transporters in ensuring proper management during storage and shipment.

3. RESPONDENTS AND THE INFORMATION REQUESTED

3(a) Respondents and SIC Codes

The following is a list of Standard Industrial Classification (SIC) codes associated with entities handling CRTs likely to be affected by the information collection requirements covered under this ICR:

SIC Code*	Industry*
	AGRICULTURE
7	Agricultural services
8	Forestry
9	Fishing, hunting, trapping
-	Administrative & auxiliary
	MINING
10	Metal mining
12	Coal mining
13	Oil & gas extraction
14	Non-metallic minerals, except fuels
-	Administrative & auxiliary
	CONSTRUCTION
15	General contractors
16	Heavy construction
17	Special trade contractors
1	Administrative & auxiliary
	MANUFACTURING
20	Food & kindred products
21	Tobacco products
22	Textile mill products
23	Apparel & other textile products
24	Lumber & wood products
25	Furniture & fixtures

SIC Code*	Industry*
26	Paper & allied products
27	Printing & publishing
28	Chemicals & allied products
29	Petroleum and coal products
30	Rubber & miscellaneous plastics products
31	Leather & leather products
32	Stone, clay, and glass products
33	Primary metal industries
34	Fabricated metal products
35	Industrial machinery & equipment
36	Electronic & other electronic equipment
37	Transportation equipment
38	Instrument & related products
39	Miscellaneous manufacturing
1	Administrative & auxiliary
	TRANSPORTATION
41	Local & interurban passenger transit
42	Trucking & warehousing
44	Water transportation
45	Transportation by air
46	Pipelines, except natural gases
47	Transportation services
48	Communication
49	Electronic, gas, & sanitary services
1	Administrative & auxiliary
	WHOLESALE TRADE
50	Wholesale trade-durable goods
51	Wholesale trade-nondurable goods
52	Bldg. materials & garden supplies
1	Administrative & auxiliary
	RETAIL TRADE
53	General merchandise store
54	Food stores
55	Auto dealers & service station
56	Apparel & accessory stores
57	Furniture & home furnishing stores

SIC Code*	Industry*
58	Eating & drinking places
59	Miscellaneous retail
1	Administrative & auxiliary
	FINANCE, INSURANCE, AND REAL ESTATE
60	Depository institution
61	Nondepository institution
62	Security & commodity brokers
63	Insurance carriers
64	Insurance agents, brokers, & servicers
65	Real estate
67	Holding & other investment offices
1	Administrative & auxiliary
	SERVICES
70	Hotels & other lodging places
72	Personal services
73	Business services
75	Auto repair, services, & parking
76	Misc. repair services
78	Motion picture
79	Amusement & recreation services
80	Health services
81	Legal services
82	Educational services
83	Social services
84	Museums, botanical, zoological gardens
86	Membership organization
87	Engineering & management service
89	Services
1	Administrative & auxiliary
1	Unclassified

* Source: U.S. Bureau of the Census (1992). Includes County Business Patterns data and data from the Enterprise Statistics Program.

3(b) Information Requested

This section describes information collection requirements applicable to CRT regulated entities that would be affected by the proposed rule.

Marking

(i) Data items:

Generators of broken used CRTs sent for recycling, and generators of processed CRT glass sent for any kind of recycling other than a glass-to-glass manufacturer or a lead smelter, must mark or label their broken used CRTs and processed CRT glass in accordance with the following procedures:

- Each container or package with broken used CRTs must be labeled or marked clearly with one of the following phrases: “Used cathode ray tube(s) - contains leaded glass,” or “Used cathode ray tube(s) - contains leaded glass.” In addition, it must also be labeled: “Do not mix with other glass or materials.”

(ii) Respondent Activities:

- Generators and processors must mark or label containers with broken used CRTs or processed CRT glass.

Storage Time Limits

(i) Data items:

Broken used CRTs and processed CRT glass may not be accumulated speculatively. Generators and processors are required to demonstrate the length of time that the CRT materials have been accumulated from the date it was received or became a waste. The demonstration may be made by using any of the following methods:

- Placing the broken used CRTs in a container and marking the container with the earliest date that any CRT in the container became a waste or was received.
- Marking each individual broken CRT with the date it became a waste or was received.
- Maintaining an inventory system on site that identifies the date the broken CRTs being accumulated became wastes or were received.
- Maintaining an inventory system on site that identifies the earliest date any broken CRT in a group of CRT items or a group of containers of CRTs became a waste or was received.
- Placing the broken CRTs in a specific accumulation area and identifying the

- earliest date that any CRT material in the area became a waste or was received.
- Any other method which clearly demonstrates the length of time that the broken CRTs has been accumulated from the date it became a waste or was received.

(ii) Respondent Activities:

- Generators and processors must demonstrate the length of time that broken CRTs has been accumulated since it became a waste or was received.

4. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

The following section discusses how EPA and implementing agencies would collect and manage the information received from respondents. This section also includes a discussion of the steps EPA will take to ensure that the information collection is not overly burdensome on small entities.

4(a) Agency Activities

The information that is required of CRT generators and processors would be kept on site and not submitted to EPA formally. Therefore, there are no follow-up activities by the Agency in response to this information.

4(b) Small Entity Flexibility

By excluding hazardous waste CRTs and processed CRT glass intended for recycling from the definition of solid waste under certain minimal conditions, the proposed rule provides regulatory relief from the full Subtitle C management requirement for all entities involved in CRT management and willing to recycle CRT glass. These entities include generators, CRT recycling facilities, and CRT glass manufacturers.

EPA believes this exclusion will encourage small businesses to safely manage broken CRTs or processed CRT glass in compliance with the proposed rule. In addition, EPA allows conditionally exempt small quantity generators (CESQGs) to manage their hazardous waste CRTs either under the existing CESQG exemption in 40 CFR 261.5 or under the specific provisions of the proposed rule.

5. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) Non-duplication

Most of the information required by the proposed regulations covered by this ICR is not available from any source but the respondents. Some of the respondents may be able to use current facility records and practices to comply with the labeling, marking and storage requirements. In addition, the proposal relieves affected CRT entities from RCRA's current information collection requirements.

5(b) Consultations

For more than two years, EPA has worked on a collaborative basis with the Computers and Electronics Sector of the CSI Council in developing the proposed CRT standards. This workgroup consisted of representatives of environmental groups, industry trade associations, CRT glass manufacturers, CRT glass recyclers, electronics Original Equipment Manufacturers (OEMs), academic experts, States (California, Massachusetts, Minnesota, and New Jersey), EPA, and expert consultants in the environmental, legal/regulatory, worker health and safety, and environmental justice issues. In addition, EPA will consider public comments submitted in response to the proposed rulemaking prior to promulgating the final rule.

5(c) Effects of Less Frequent Collection

EPA will consider carefully the burden imposed upon the regulated community by the proposed regulations, and to the extent possible, will attempt to minimize the burden imposed. EPA believes strongly that if the minimum requirements specified under the proposed regulations are not met, neither the facilities nor EPA will be able to ensure that used CRTs are being managed in a manner protective of human health and the environment.

5(d) General Guidelines

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act, OMB's implementing regulations, OMB's Information Collection Review Handbook, and other applicable OMB guidance.

5(e) Confidentiality

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which define EPA's general policy on public disclosure of information, contain provisions for confidentiality. The information provided by the entities regulated under the proposed regulations will be treated in accordance with these provisions, as appropriate.

5(f) Sensitive Questions

No questions of a sensitive nature are included in any of the information collection requirements.

6. ESTIMATING THE BURDEN AND COST OF COLLECTION

6(a) Estimating Respondent Burden

This ICR presents a comprehensive characterization of the reporting and recordkeeping burden and costs to CRT generators and processors under the proposed rule.

6(b) Number of Respondents

The number of facilities that would be covered by the proposed rule was obtained from EPA's "Draft Economic Analysis of Cathode Ray Tube Management, Notice of Proposed Rulemaking," dated August 24, 2001. EPA estimates that 2,116 small quantity handlers/collectors, 311 large quantity handlers/collectors and 5 processors will generate CRTs or processed CRT glass that is exempt from the definition of solid waste under this rule. Further, EPA expects that each year one percent of the generators will be new generators.

Reading the Regulations

EPA expects that regulated CRT entities will read the applicable waste CRT regulations as a one-time activity in order to familiarize themselves with the new rule.

Marking

EPA expects that all generators and processors will label packages or containers containing broken CRTs. Generators and processors are not expected to mark each individual, broken CRT, but rather accumulate them in clearly marked containers or vehicles, thus minimizing the recordkeeping burden.

Storage Time Limits

EPA expects that some CRT entities will keep records on their storage time according to procedures specified in the regulations. EPA believes the remaining entities will use standard business practices. EPA estimates that 75 percent of CRT regulated entities will keep records by marking storage containers or storage areas with the earliest date that broken CRTs became a waste or were received. EPA estimates that the remaining 25 percent of CRT regulated entities will use standard business practices which account for storage time and satisfy the proposed rule requirements; these entities therefore are not burdened in this ICR.

EPA expects that the burden imposed by the proposed rule is associated with rule

familiarization and marking and labeling packages or containers with broken CRTs. Table 1 provides background data on the number of used CRT entities and shipments. Shipments are based on two per small quantity handler/collector and four for large quantity handlers/collectors per year. Table 2 shows the one time rule familiarization cost and the average annual burden and costs for generators, collectors, and processors to comply with each CRT requirement. The table includes estimated labor costs and operation and maintenance (O&M) costs. Table 3 summarizes, by respondent type, the total annual burden and costs.

Table 1
Estimated Number of CRT Shipments

Type of Regulated Entity	Number of Regulated Entities	Total # of Shipments Sent Off Site
Small Quantity Handlers/Collectors	2,116	4,232
Large Quantity Handlers/Collectors	311	1,244
Processors	5	128
Total	2,432	5,604

TABLE 2
REPORTING AND RECORDKEEPING REQUIREMENTS
FOR CRT REGULATED ENTITIES:
ONE TIME COST PER ENTITY

						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page	Contractor Support @ \$80.00/hr	Hours per Respondent	Cost Per Respondent	Total Cost All Respondents
		Legal @ \$116.53/hr	Manager @ \$110.95/hr	Technical @ \$60.89/hr	Clerical @ \$43.44/hr						
CRT RULE FAMILIARIZATION											
Small Quantity Handlers/Collectors	2,116	0.0	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$202.28	\$428,024.48
Large Quantity Handlers/Collectors	311	0.5	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	3.0	\$260.56	\$81,034.16
Processors	5	0.0	1.0	1.5	0.0	\$0.00	\$0.00	\$0.00	2.5	\$202.28	\$1,011.40
SUBTOTAL	2,432	0.5	3.0	4.5	0.0	\$0.00	\$0.00	\$0.00	8.0	\$665.12	\$510,070.04
REPORTING AND RECORDKEEPING REQUIREMENT FOR CRT REGULATED ENTITIES											
ANNUAL ESTIMATED RESPONDENT BURDEN AND COST											
						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping @ \$3/doc	Photocopies @ \$0.10/page	Contractor Support @ \$80.00/hr	Hours Per Year Per Respondent	Cost Per Year Per Respondent	Total Cost Per Year Per All Respondents
		Legal @ \$116.53/hr	Manager @ \$110.95/hr	Technical @ \$60.89/hr	Clerical @ \$43.44/hr						
Mark the broken CRTs or containers											
Small Quantity Handlers/Collectors	2,116	0.0	0.0	0.5	0.0	\$0.00	\$0.00	\$0.00	0.5	\$30.45	\$64,432.20
Large Quantity Handlers/Collectors	311	0.0	0.0	2.0	0.5	\$0.00	\$0.00	\$0.00	2.5	\$143.50	\$44,628.50
Processors	5	0.0	0.0	0.5	0.0	\$0.00	\$0.00	\$0.00	0.5	\$30.45	\$152.25

SUBTOTAL	2,432	0.0	0.0	3.0	0.5	\$0.00	\$0.00	\$0.00	3.5	\$204.39	\$109,212.95
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**REPORTING AND RECORDKEEPING REQUIREMENT
FOR CRT REGULATED ENTITIES**

ANNUAL ESTIMATED RESPONDENT BURDEN AND COST

						O&M Costs per Respondent					
	Number of Respondents	Hours per Respondent				Postage/ Shipping	Photocopies	Contractor Support	Hours Per Year Per Respondent	Cost Per Year Per Respondent	Total Cost Per Year Per All Respondents
		Legal @ \$116.53/hr	Manager @ \$110.95/hr	Technical @ \$60.89/hr	Clerical @ \$43.44/hr	@ \$3/doc	@ \$0.10/page	@ \$80.00/hr			

Mark storage container or area used to store CRTs or CRT glass with the date the waste was received or became a waste

Small Quantity Handlers/Collectors	2116	0.0	0.0	0.25	0.25	\$0.00	\$0.00	\$0.00	0.5	\$26.08	\$55,185.28
Large Quantity Handlers/Collectors	311	0.0	0.0	0.50	0.25	\$0.00	\$0.00	\$0.00	0.75	\$41.31	\$12,847.41
Subtotal	2427	0.0	0.0	0.75	0.50	\$0.00	\$0.00	\$0.00	1.25	\$67.39	\$68,032.69

TOTAL ONE TIME COST PER FACILITY

SQH/Collectors	2116	0.0	1.0	1.50	0.00	\$0.00	\$0.00	\$0.00	6.0	\$202.28	\$428,024.48
LQH/Collectors	311	0.5	1.0	1.50	0.00	\$0.00	\$0.00	\$0.00	3.0	\$260.56	\$81,034.16
Processors	5	0.0	1.0	1.50	0.00	\$0.00	\$0.00	\$0.00	2.5	\$202.28	\$1,011.40
TOTAL	2432	0.5	3.0	4.50	0.00	\$0.00	\$0.00	\$0.00	11.5	\$665.12	\$510,070.04

TOTAL ANNUAL ESTIMATED RESPONDENT BURDEN AND COST

SQH Total	2116	0.0	0.0	0.75	0.25	\$0.00	\$0.00	\$0.00	1.00	\$56.53	\$119,617.48
LQH Total	311	0.0	0.0	2.50	0.75	\$0.00	\$0.00	\$0.00	3.25	\$184.81	\$57,475.91
Processors	5	0.0	0.0	0.50	0.00	\$0.00	\$0.00	\$0.00	0.50	\$30.45	\$152.25
TOTAL	2432	0.0	0.0	3.75	1.00	\$0.00	\$0.00	\$0.00	4.75	\$271.79	\$177,245.64

6(c) Estimating Respondent Costs

Labor

The average annual salaries of the professionals listed in Table 2 are based on data found in the U.S. Department of Labor Statistics (BLS) “National Compensation Survey: Occupational Wages in the United States, 1997.” Wages were calculated using the BLS rate with the labor multiplier. The labor rates are based on a full-time employee with a 40-hour work week. Total annual respondent labor costs, summarized in the 3rd column of Table 3, are estimated to be \$510,070 for the initial one time cost and \$177,245.64 for the annual variable costs.

Operation and Maintenance

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the 1995 Paperwork Reduction Act as “the recurring dollar amount of cost associated with O&M or purchasing services.” For this ICR, EPA estimates that there are no respondent O&M costs.

Capital

Capital costs usually include any produced physical good needed to provide or keep records of the needed information, such as machinery, computers, and other equipment. For this ICR, EPA estimates that there are no respondent capital costs.

**TABLE 3:
REPORTING AND RECORDKEEPING REQUIREMENTS FOR
HANDLERS, COLLECTORS AND PROCESSORS:
ANNUAL RESPONDENT BURDEN AND COST
SUMMARY (ALL RESPONDENTS)**

Respondent Type	Total Hours for Annual Variable Costs	Labor Costs	Capital Costs	O&M Costs	Total Costs
Small quantity handlers/collectors	14,812	\$119,617	\$0	\$0	\$119,617
Large quantity handlers/collectors	1,011	\$57,476	\$0	\$0	\$57,476
Processors	33	\$152	\$0	\$0	\$152
TOTAL	15,855	\$177,245	\$0	\$0	\$177,245

6(d) Reasons for Change in Burden

EPA expects that the proposed rule will result in a reduction in burden to the regulated waste CRT community. CRT entities sending broken CRTs or CRT glass for recycling would no longer be subject to full Subtitle C requirements. Following is a list of primary RCRA reporting and recordkeeping requirements that CRT entities may be relieved of:

- ▶ Reporting waste generation data for the EPA's Biennial Report, as covered in ICR No. 976, Biennial Report ICR;
- ▶ EPA notification of hazardous waste activity;
- ▶ Reporting and recordkeeping under the land disposal restrictions (LDRs) program of 40 CFR Part 268, as covered in ICR No. 1442, Land Disposal Restrictions ICR;
- ▶ Reporting and recordkeeping under the hazardous waste manifest requirements, as covered in ICR No. 801, Manifest ICR; and
- ▶ Recordkeeping and/or reporting of personnel training, contingency plan, and emergency procedures under the generator standards of 40 CFR Part 262, as covered in ICR No. 820, Hazardous Waste Generator Standards ICR.

Table 4 presents the average and the total avoided respondent burden resulting from the proposed rule. This avoided burden is based on the average annual burden per respondent as estimated in the ICRs listed above. Table 4 also presents the total estimated avoided entity burden by multiplying the average avoided burden per respondent by the total number of CRT entities expected to be affected by the proposed rule.

Table 4
Average and Total Annual Avoided Respondent Burden (Hours)

Primary RCRA Requirements No Longer Applicable to CRT Glass-to-glass Regulated Entities	Average Annual Respondent Burden Savings per Regulated Entity (in hours)		
	Small Quantity Handler	Large Quantity Handler	Processor
Prepare and Submit Notification of Hazardous Waste Activity	1 (RP)	1.5 (RP)	N/A
Prepare and submit Hazardous Waste Biennial Report Forms	N/A	12 (RP)	12 (RP)
Prepare and transmit LDR notifications to treatment and disposal facilities and keep records	1 (RP)	2 (RP)	6 (RP)
	0.5 (RK)	1 (RK)	2 (RK)
Prepare and transmit manifests and keep records	1 (RP)	2 (RP)	8 (RP)
	0.5 (RK)	1 (RK)	2 (RK)
Personnel training	0.5 (RK)	4 (RK)	8 (RK)
Contingency plan	N/A	3 (RK)	6 (RK)
Emergency procedures	0	2 (RK)	2 (RK)
Total Avoided Burden per Regulated Entity	3 (RP)	17.5 (RP)	26 (RP)
	1.5 (RK)	11 (RK)	20 (RK)
Number of Regulated Entities Affected by the Proposed Rule	2116	311	5
Total Avoided Burden	6,348 (RP)	5,443 (RP)	130 (RP)
	3,174 (RK)	3,421 (RK)	100 (RK)

RP: Reporting; RK: Recordkeeping

6(e) **Burden Statement**

Table 5 presents the estimated average burden hours per respondent per year for the reporting and recordkeeping requirements covered by this ICR. The reporting burden includes time to comply with the proposed notification, environmental justice, and exporting requirements. The recordkeeping burden includes time to follow the proposed labeling/marketing and storage time limit requirements.

Table 5
Average Annual Burden per CRT Respondent (Hours)

Type of Regulated Entity	Estimated Annual Reporting Burden	Estimated Annual Recordkeeping Burden	Estimated Number of Each Entity	Estimated Total Burden
Small Quantity Generators/Collectors	0	1	2,116	2,116
Large Quantity Generators/Collectors	0	3.25	311	1011
Processors	0	0.5	5	2.5

As shown in Table 5, the total annual burden is estimated to be 1 hour for small quantity handlers, 3.25 hours for large quantity handlers, and 0.5 hour for processors.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulation are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through the use of automated collection techniques, to the Director, Office of Policy, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.